

Inspection Date: 4/17/86

Inspector: Barron Peeler

Att 2

Whittaker Bermite - CAD064573108

### Inspection Report

I On 4/17/86, a TSD inspection was conducted at Whittaker Corporation - Bermite Division, 2216 West Soledad Canyon Road, Saugus, California 91350 <sup>Los Angeles Regional Office,</sup> by Barron Peeler of S.E.U. During the course of this inspection, information was gathered in accordance with Section 3007 of RCRA.

During the course of this ~~inspection~~ <sup>record</sup> review and facility inspection, the following were observed:

Barron J. Peeler, WMS/SCS  
Facility Representative: Thomas J. Bloom (manager, Environmental)  
John Pelquin - Env. Engineer (Health + Safety)  
Larry Bohanon - acting General Manager

### II Description of Facility - See EPA checklist pg. 2 (Unit 9)

- The tank farm is inactive at this time because the protective liners need to be replaced. The facility is using two temporary tanks to hold the clean up water. The temporary tanks hold 500 gallons each. One tank contained Lead Acide wash water which was manifested 4/16/86. The other tank contains mop water. It produced about 55 gal per two weeks.
- Production is low at this time of the year

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- The Flammable liquids consist of mainly hexane acetone and water. This has not been manifested ~~and~~ since 3/10/86. The facility plans on processing the waste through a recovery process which was submitted to DOHS + AQMD.
- Facility is also addressing new ways to handle waste streams by a Chemical Neutralization Process. The plan however has not been submitted to DOHS.
- The manifest seem to be in place and properly filled out.
- The lead azide neutralization process is the only treatment system.
- Contingency Plan has been revised for Part B application on 2/86. Mr. Bloom said DOHS has been submitted a copy. Procedures for explosion and fires were added in contingency plan.
- Personnel ~~needs~~ to be changed - delete John Pearson, environmental Engineer.
- Mr. Peeler received a copy of the <sup>revised</sup> Waste analysis Plan which was submitted 8/27/85 to DOHS.

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- Inspection + Inspection Log - Facility implemented inspection log and reports of Tank Storage, Container Storage and Building/Magazine Storage in 1986

Daily, Weekly + Monthly Reports are kept at the Facility

- Closure Plan + Closure Cost was submitted to DOHS revised version for Part B Application for:

1. Storage + Treatment in Tanks + Containers  
(Units 1, 2, 3, 4, 5, 6, 8A, 8B, 9A, 9B + 13)

2. Burning Ranges (Units 7, 12)

New Plan was effective 2/86. <sup>new</sup> Plan replaces 3/1/85 plan.

- Other revision for Part B interim status

1. Relocation of storage - Burning Range material is now stored in Bld. 223 Unit 6<sup>on</sup> lower Magazine Rd

2. Facility also Revised Part A during Part B submittal concerning change in location.

- Personnel Training Records are at Facility  
Operating Record has been revised

- One of the ~~the~~ pressure tested fuel oil tank had a leak (pinhole)  
It exceed the AA levels. Analysis showed 199 ppm in a localized area.

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- Ground Water Monitoring has been limited

Bld. 342 lower pad is closed

Bld 317 Tank Farm ~~has not been sampled.~~ <sup>has not been sampled.</sup>

(pictures were taken)

- Inspection of Facility - observations and comments

- Surface Impoundments -

Unit 9 = Upper Pad = Tank Farm

Unit 8 = Lower Pad = Temporary Storage Area - Facility wants this pad to be the future Drum Storage Area. They have been using ~~the~~ the pad for storage since 1986 of January.

- Unit 6 - Pyrotechnic Storage - waste from burn range to Unit 6 consist of 3 storage bunker relocated from the burn range.

- Lead Azide Treatment <sup>(tanks)</sup> Unit

- Bld 223 - Unit 2 or PEP storage - holds contaminated combustibles stored in conductive bags tied off inside fiber board drums. (Used to be located in the burning range).

- Unit 1 - inactive since 1980 - use to <sup>(hold)</sup> process Red Phosphorus wash down.

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• Minor Problem is Temporary Drum Storage Area

1. One drum exceeded the 90 storage. Date 11/13/85
2. Drum labeled III Tric top is off. ~~Top~~<sup>Drum</sup> needs to be covered
3. 500 gal drum label needs to be taken off since drum was manifested (pumped out) yesterday.

Mr. Bloom said he will address + resolved these problem quickly -

- There are still questions to whether or not the Lead Azide wash off area was a surface impoundment or a tank storage area originally. However the area is posted as a hazardous waste area. Facility believes that area originally had a tank (storage).
- Mr. Bloom will submit to Mr. Peeler
  1. Letter from Martin <sup>Pumping</sup> verifying inventory <sup>Contractor Service Agreement</sup> transportation of waste
  2. Evacuation emergency route map. Site Plan Dry #602440
  3. Contingency Plan - page 3 Revised Notification List
  4. Management Unit #6, Inventory Example

Papers were submitted <sup>to DPHS</sup> 4/22/86

- Facility is not open burning anymore. They want to incinerate but need approval from AQMD.

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### III VIOLATIONS OBSERVED

Whittaker Bermet has some pending violation from EPA inspection on 6/25/85. Many of these violations have been resolved.

A few minor details were discussed with ~~State~~ facility such as:

- 1) one uncovered drum in temporary storage area
- 2) Hazardous Waste label on drum when it should be <sup>in</sup>
- 3) Contingency Plan - one page missing.

However no new major violation were observed.

### IV Discussion with Management

This facility has presently submitted a revised Part B under interim status. They has also submitted to DOTS revised Closure Plan + Cost for Closure at there 1.) Storage + Treatment in Tanks and Containers and 2.) Burning Ranges. Whittaker has not open burned since AQMD shut that process down in 1985. Whittier wants to incinerate but needs approval also from AQMD.

Production is very low at this time of the year.

Att 1

GROUND WATER MONITORING AND ENFORCEMENT LOG

INSPECTOR

(213) 620-2380 Barron Peeler

1. EPA ID: CA 064523, L08 3. RCRA FACILITY: ☒ 4. FACILITY: ☒ Major TSD / / Generator  
/ / Non-Major TSD / / Trans  
/ / Other
2. HANDLER NAME: Whittaker Corporation Beehive Division  
22116 West Soledad Canyon Road, Sausalito, CA 91350 Los Angeles County
5. DATE OF INITIAL EVALUATION WHICH IS THE BASIS FOR THIS REPORT: 4/17/86 5a. RESPONSIBLE AGENCY: ☒ = State ☒ (DHS) / SWRCB  
B = Contractor/State (County)

6. TYPE OF EVALUATION COVERED BY THIS REPORT:  
(circle all that apply)
- ① = Evaluation Inspection (annual/ISD) 6 = Citizen Complaint  
② = Sampling inspection 7 = Part B Call In  
③ = Record Review 8 = Withdrawal Candidate  
4 = Ground Water Monitoring Evaluation 9 = Closed Facility  
5 = Follow Up 0 = General  
A = Meetings

7. DATE OF EVALUATION COVERED BY THIS REPORT (enter only if different from 5): Already in HWDMS \_\_\_/\_\_\_/\_\_\_

8. VIOLATIONS:

Comments

Class of violation	Area of Violation						
	GWM	CL/PC	Fin. Res	Pt. B	Cmpl. Sch	Manifest	Other
I						1-0 3-0	1-0 3-0
II						3-0	

9. ENFORCEMENT ACTIONS:

Class	Area of Violation	Type (use code)	Date Action Taken	Compliance Dates		Penalty		Agcy (code)
				Scheduled	Actual	Assessed	Collected	

Comments:

copy

SCS

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Inspection Report  
U.S. Environmental Protection Agency  
Region 9  
Toxics and Waste Management Division  
Field Operations Branch

(DOHS - SCS)

Purpose: TSD Inspection

Facility Name: Whittaker Bernite

Street: 2216 West Soledad Canyon Road

City: Saugus State: CA Zip Code: 91350

EPA ID number: CA D 064573108

Report Number:

Date of Investigation: 4 / 17 / 86

EPA Inspector(s):

State Inspector(s): Barron J. Peeler  
(213) 620-2380

Facility Representative(s): Thomas J. Bloom (213) 629-1403  
Manager, Environmental Health + Safety  
John Peloguin (303) 366-8469  
Corporate Hygienist & Environmental Engineer

Report Prepared By: Barron Peeler



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Form A - Interim Status Standards for Facilities  
that Treat, Store or Dispose of Hazardous Waste

I. General Information:

(A) Operator: Bermite Division of Whittaker Corporation  
Street: 22116 West Soledad Canyon Road  
City: Saugus State: CA Zip Code: 91350

(B) Owner: Whittaker Corporation  
Street: 10880 Wilshire Boulevard  
City: Los Angeles State: CA Zip Code: 90024

(C) Site Activity:

Generation: Complete Form B Small Quantity Generator:  
Transportation: Complete Form C Complete Form D  
Recycler: Complete Form E

<u>Storage:</u>	<u>Disposal:</u>
<u>X</u> Container (S01)	<u>Injection Well (D79)</u>
<u>Tank (S02)</u>	<u>Landfill (D80)</u>
<u>Waste Pile (S03)</u>	<u>Land Application (D81)</u>
<u>X</u> Surface Impoundment (S04)	<u>Ocean Disposal (D82)</u>
	<u>Surface Impoundment (D83)</u>

<u>Treatment:</u>	<u>Process Code:</u>	<u>Design Capacity:</u>
<u>X</u> Tank (T01)	<u>T01</u>	<u>200 U</u>
	<u>S01</u>	<u>46,695 G</u>
	<u>S04</u>	<u>100,000 G</u>
<u>Surface Impoundment (T02)</u>	<u>_____</u>	<u>_____</u>
<u>Incinerator (T03)</u>	<u>_____</u>	<u>_____</u>
<u>Other (T04)</u>	<u>_____</u>	<u>_____</u>

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I. General Information: - Continued

(D) Nature Of Business:

Whittaker Bermites produces at their facility explosives, propellants, Elsie, and igniter products under contract with the Department of Defense.

(E) Description Of Facility Processes:

Site operations are spread over a large area of semi-rural land, with waste operations remote from each other and the property lines. The facility has a number of Hazardous Waste Units: Lead Azide Wash Water Treatment Unit, Lead Acid Surface Impoundment, East Fork Detonation Range, Portable Storage Magazines, Waste Pyrotechnic Storage Magazine, Drum Storage Unit (by Building 317), Future Drum Storage Unit, Open Burning Area, Storage Tank Farm, and closed Surface Impoundment. A revised Part A has been submitted that reflects the current and expected future operation that occur on site. Contingency Plan and Waste Analysis Plan has been revised. Three hazardous waste impoundment units have been closed. The Red Phosphorus Stabilizing lagoon, the reactives and spent solvents surface impoundment and the lead azide neutralization process, now replaced by the tank farm unit, are not in use. The facility has no groundwater monitoring program.

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I. General Information: - Continued

(F) Report Attachments:

Att 1 - C M E L

Att 2 - Inspection Report

INSPECTOR, *BP*

(Part 270 Subpart G)

### Comments

(A) Qualifying For Interim Status:

1. For the existing facility to be treated as having been issued a permit, the facility must have:

- c. Achieved compliance with RCRA interim status standards (270.70b)?

(B) Operating During Interim Status:

1. Has the facility complied with the following restrictions:

- c. Has not exceeded design capacities specified in the Part A (270.71a.3)?

(C) Changes During Interim Status:

1. Has a revised Part A been submitted prior to the following changes:

4. Have the changes made not amounted to reconstruction (270.72e)?

Not inspected

change in location of HW storage

NA

NA

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### III. General Facility Standards: (Part 265 Subpart B)

Yes   No   Comments

#### (A) Required Notices:

1. Has the RA been notified regarding the receipt of H.W. from a foreign source (265.12a)?               N/A all waste generated on site
2. Before transferring ownership, has the facility notified the new owners in writing of the requirements of Parts 265 and 122 (265.12b)?               N/A

#### (B) General Waste Analysis:

1. Has the facility obtained a detailed chemical and physical analysis of each H.W. (265.13a.1)? ✓        submitted 8/27/85
2. Does the analysis contain all information that must be known to properly treat, store or dispose of the H.W. (265.13a.1)? ✓
3. Does the facility have records documenting the required H.W. analysis, e.g., lab reports, published data, generator supplied data (265.13a.2)? ✓        Analysis are with manifest
4. Has the analysis been repeated to ensure that it is accurate and up-to-date (265.13a.3)?        ✓ Waste streams are the same.  
2/4/85 certification of generator decommissioning
5. Is the analysis repeated when there is a change in the process (265.13a.3)? ✓
6. For off-site facilities, is the analysis repeated when the H.W. received does not match the H.W. designated on the manifest (265.13a.3)?               N/A
7. For off-site facilities, does the facility inspect or analyze each movement of H.W. to verify that the H.W. received matches the identity of the H.W. specified on the manifest (265.13a.4)?               N/A

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### III. General Facility Standards: - Continued (Part 265 Subpart B)

	Yes	No	Comments
8. Does the facility have a detailed waste analysis plan (265.13b)?	✓		WAS submitted 8/27/95
9. Does the facility follow the procedures specified in the waste analysis plan (265.13b)?	✓		
10. Does the waste analysis plan contain the following elements:			
a. Parameters of analysis of each H.W. handled (265.13b.1)?	✓		
b. Rationale for the selection of each parameter (265.13b.2)?	✓		
c. Test methods used to obtain a representative sample of H.W. (265.13b.3)?	✓		
d. Frequency which each analysis will be repeated (265.13b.4)?	✓		
e. For off-site facilities, the analysis that generators have agreed to supply (265.13b.5)?			N/A
11. For off-site facilities, does the plan specify procedures for inspection or analysis of each movement of H.W. (265.13c)?			N/A
12. For off-site facilities, does the plan contain the following elements:			
a. Description of procedures used to identify each movement of H.W. (265.13c.1)?			N/A
b. Description of the sampling method used to obtain a representative sample of the H.W. (265.13c.2)?			N/A

(C) Security:

1. Do security measures include:

- a. 24-hour surveillance (265.14b.1)?

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III. General Facility Standards: - Continued  
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
b. Artificial or natural barriers and controlled entry (265.14b.2)?	✓	—	_____
c. Signs with the legend "Danger-Unauthorized Personnel Keep Out" posted at entrances to active portions of facility (265.14c)?	✓	—	_____
(D) General Inspection Requirements:			
1. Does the facility inspect for equipment malfunctions and deterioration, operator errors, and H.W. discharges (265.15a)?	✓	—	_____
2. Does the facility follow a written inspection schedule (265.15b.1)?	✓	—	state I.S. 1/1/86
3. Is the schedule kept at this facility (265.15b.2)?	✓	—	_____
4. Does the schedule identify types of problems that are expected from malfunction, operator error, deterioration or discharges of all: (265.15b.3)			
a. monitoring equipment?	✓	—	_____
b. safety, emergency equipment?	✓	—	_____
c. security equipment?	✓	—	_____
d. operating and structural equipment?	✓	—	_____
5. Does the schedule indicate the frequency of inspection for each item (265.15b.4)?	✓	—	_____
6. Does the schedule include daily inspections of loading and unloading areas (265.15b.4)?	✓	—	_____
7. Has the facility taken remedial action to correct the problems revealed on an inspection (265.15c)?	✓	—	_____

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(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
8. Are inspections recorded in an inspection log (265.15d)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9. Does the log include: (265.15d)			
a. Date and time of inspection?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b. Name of inspector?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>initials of inspector</u>
c. Observations recorded?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
d. Date and nature of repairs or other remedial actions?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
10. Are inspection records kept for at least 3 years (265.15d)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>started 1/1/86</u>
(E) Personnel Training:			
1. Does the facility have a personnel training program (265.16a.1)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Is it directed by a person trained in H.W. management procedures (265.16a.2)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does the program include training in: (265.16a.3)			
a. Procedures for using, inspecting, repairing and replacing emergency and monitoring equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b. Emergency procedures including contingency plan implementation?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Do new personnel receive required training within 6 months (265.16b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Do personnel take part in an annual review of the initial training (265.16c)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	



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III. General Facility Standards: - Continued  
(Part 265 Subpart B)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
6. Do personnel training records include: (265.16d)			
a. Job titles?	✓	—	in contingency
b. Job Descriptions?	✓	—	plan
c. Descriptions of training?	✓	—	
b. Records of training?	✓	—	
(F) Requirements For Ignitable, Reactive, Or Incompatible Wastes:			
1. Are the following precautions taken to prevent accidental ignition or reaction: (265.17a)			
a. Separation and protection from ignition sources?	✓	—	
b. No smoking signs in hazard areas?	✓	—	
2. Is the T/S/D of ignitable, reactive and incompatible waste conducted so that it does not: (265.17b)			
a. Generate extreme heat or pressure, fire or explosion, or violent reaction?	—	—	N/A
b. Produce uncontrolled toxic or flammable mists, fumes, dusts or gases?	✓	—	
c. Damage structural integrity of H.W. containment devices? (e.g., tanks, containers, liners)	✓	—	
d. Threaten human health or the environment?	✓	—	

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IV. Preparedness and Prevention:  
(Part 265 Subpart C)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(A) Is the facility designed, constructed, maintained, and operated to minimize the possibility of <u>fire</u> , <u>explosion</u> , or releases of H.W. or H.W. constituents to air, soil, or surface water which could threaten human health or the environment (265.31)?	—	—	N/A Fire & explosion are disposal techniques.
(B) Required Equipment:			
1. Does the facility have the following equipment where applicable:			
a. Internal communications or alarm systems (265.32a)?	✓	—	Submitted in Contingency Plan 2/86
b. Telephone or 2-way radios at the scene of operation (265.32b)?	✓	—	..
c. Portable fire extinguishers with water, foam, inert gas, dry chemical; spill control and decontamination equipment (265.32c)?	✓	—	
d. Water at adequate volume and pressure or foam producing equipment or automatic sprinklers (265.32d)?	✓	—	
(C) Testing And Maintenance Of Equipment:			
1. Does the facility test and maintain emergency equipment in operable condition (265.33)?	✓	—	
(D) Access To Communications Or Alarm Systems:			
1. Do personnel in areas where H.W. is being handled have immediate access to these systems (265.34)?	✓	—	
(E) Required Aisle Space:			
1. Is there adequate aisle space for unobstructed movement of fire, spill control and decontamination equipment in an emergency (265.35)?	✓	—	

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IV. Preparedness and Prevention: - Continued  
(Part 265 Subpart C)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(F) Arrangements With Local Authorities:			
1. Has the facility made the following arrangements:			
a. Arrangements to familiarize police, fire dept., and emergency response team with H.W. operations (265.37a.1)?	✓	—	—
b. Agreements designating primary emergency authority (265.37a.2)?	✓	—	—
c. <u>Agreements</u> with State emergency response teams, contractors and equipment suppliers (265.37a.3)?	—	—	(Martin Pumping) submitted to DDHS 7/1/86
d. Arrangements to familiarize local hospitals with the properties of H.W. and the types of potential injuries and illnesses from exposure to H.W. (265.37a.4)?	✓	—	—
2. Did the facility document in the operating record any refusal by State or local authorities to enter into such arrangements (265.37b)?	—	—	N/A

V. Contingency Plan and Emergency Procedures:  
(Part 265 Subpart D)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(A) Does the facility have a contingency plan (265.51a)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
(B) Content Of Contingency Plan:			
1. Does the plan describe actions personnel must take to comply with §§ 265.51 & 265.56 in response to fires, explosions, or unplanned releases of H.W. (265.52a)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Does the plan describe arrangements agreed by police, fire dept., hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to § 265.37 (265.52c)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Does the Plan list names, addresses, and phone numbers (office & home) of all persons qualified to act as emergency coordinators (265.52d)? (list in order of responsibility)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
4. Does the plan list all emergency equipment including the location and physical description of each item on the list and a brief outline of its capability (265.52e)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Does the plan include an evacuation plan for personnel and a description of signals to begin evacuation, evacuation routes and alternate routes (265.52f)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Evacuation Plan Submitted 4/86 to DDHS.
(C) Copies of Contingency Plan:			
1. Is the plan maintained at the facility (265.53a)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Has the plan been submitted to all local emergency organizations (265.53b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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V. Contingency Plan and Emergency Procedures: - Con't.  
(Part 265 Subpart D)

Yes   No   Comments

(D) Amendment Of Contingency Plan:

1. Has the plan been reviewed and immediately amended when required (265.54)?

✓         

in process of review by DOHS

(E) Emergency Coordinator:

1. Is the coordinator familiar with all aspects of site operation and emergency procedures (265.55)?

✓         

2. Does the coordinator have authority to carry out the contingency plan (265.55)?

✓         

(F) Emergency Procedures:

1. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in § 265.56 (265.56)?

               

N/A

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VI. Manifest System, Recordkeeping, and Reporting:  
(Part 265 Subpart E)

Yes   No   Comments

(A) Use of Manifest System:

1. Does the facility comply with the following manifest requirements:

a. Sign and date each copy of the manifest (265.71a.1)?

☒

b. Note any significant \* discrepancies in the manifest (265.71a.2)?

☒

c. Give transporter one copy of the signed manifest (265.71a.3)?

☒

d. Within 30 days after delivery, send a copy of the manifest to the generator (265.71a.4)?

☒

2. Are records of past shipments retained for 3 years (265.71a.5)?

☒

(B) Manifest Discrepancies:

1. Upon discovering a significant discrepancy, has the facility made an attempt to reconcile the discrepancy with the generator or transporter (265.72b)?

☒

2. For discrepancies not reconciled within 15 days, has the facility followed the required reporting procedures (265.72b)?

☒

(C) Operating Record:

1. Does the facility maintain an operating record (265.73a)?

☒

\* Significant discrepancies are:

1. For bulk waste; variations > 10% in weight
2. For containerized waste; variations > one drum
3. Obvious differences such as waste solvent substituted for waste acid

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VI. Manifest System, Recordkeeping, and Reporting: - Con't  
(Part 265 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
2. Does the operating record contain the following information:			
a. A description and the quantity of each waste received (265.73b.1)?	—	—	N/A No offsite waste accepted
b. The method(s) and date(s) of its treatment, storage or disposal as required by Appendix I (265.73b.1)?	✓	—	Need revision
c. The location of each waste within the facility and the quantity at each location (265.73b.2)? (This information must include cross-references to specific manifest numbers.)	✓	—	
d. For disposal facilities, the location and quantity of each waste is recorded on a map or diagram of each cell or disposal area (265.73b.2)?	—	—	N/A
e. Records and results of all waste analysis and trial tests (265.73b.3)?	✓	—	
f. Reports detailing all incidents that required implementation of the contingency plan (265.73b.4)?	—	—	N/A
g. Records and results of operator inspections (265.73b.5)?	✓	—	Inspection schedule
h. Monitoring data (265.73b.6)?	—	—	N/A
i. All closure and post-closure costs as applicable (265.73b.7)?	✓	—	
(D) Availability, Retention, Disposition Of Records:			
1. Are all records including plans available for inspection (265.74a)?	✓	—	
2. Have copies of records of H.W. disposal locations and quantities under § 265.73b.2 been submitted to the RA and local land authority upon closure of the facility (265.74c)?			N/A

VI. Manifest System, Recordkeeping, and Reporting: - Con't.  
(Part 265 Subpart E)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
(E) Biennial Report:			
1. Has the facility submitted a biennial report to the RA by March 1 of each even numbered year (265.75)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
2. Was the report submitted on EPA form 8700-13B and cover facility activities during the previous calendar year ( 265.75)?	<input type="checkbox"/>	<input type="checkbox"/>	<i>N/A</i>
3. Does the report include the following information: (265.75)			
a. EPA identification number, name and address of the facility?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b. Calendar year covered by report?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c. For off-site facilities, the EPA identification number of each generator?	<input type="checkbox"/>	<input type="checkbox"/>	<i>N/A</i>
d. Description and quantity of each H.W. received and, for off-site facilities, the EPA identification number of each generator listed with this information?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
e. Methods of treatment, storage, or disposal for each H.W.?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
f. Monitoring data under § 265.94a.2.ii and iii and b.2 ?	<input type="checkbox"/>	<input type="checkbox"/>	<i>N/A</i>
g. Most recent closure and post-closure cost estimates?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<i>Closure for Burning Range dated 2/86</i> <i>Closure for Treatment tank dated 2/86</i>
h. Required certification?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	



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VI. Manifest System, Recordkeeping, and Reporting: - Con't  
(Part 265 Subpart E)

Yes   No   Comments

(F) Unmanifested Waste Report:

1. For a facility that has accepted a H.W. from an off-site source without an accompanying manifest, was a report containing the required information submitted to the RA within 15 days after receiving the H.W. (265.76a-g)?

\_\_\_\_\_ N/A \_\_\_\_\_

(G) Additional Reports:

1. Has the facility reported to the RA: (265.77)

a. Releases, fires and explosions?

\_\_\_\_\_ N/A \_\_\_\_\_

b. Ground-water contamination and monitoring data?

\_\_\_\_\_ N/A \_\_\_\_\_

c. Facility closure?

\_\_\_\_\_ N/A \_\_\_\_\_

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VIII. Closure and Post-Closure: - Continued  
(Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
b. Estimate of the maximum inventory of H.W. in storage and in treatment at any time during the life of the facility (265.112a.2)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c. Does the inventory include the maximum amount of on-site:			
H.W. in surface impoundments?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>In the closure cost backup data</u>
H.W. in tanks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
H.W. in piles?	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
H.W. in containers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
H.W. in drainage pits or sumps?	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
Contaminated soil from spills or leaks?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Contaminated soils and liners from non-disposal impoundments?	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
Contaminated soils from land treatment fields?	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
Decontamination residues?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Process residues?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Other (specify)?	<input type="checkbox"/>	<input type="checkbox"/>	
d. Decontamination procedures including: (265.112a.3)			
A list of equipment, containers, structures requiring decontamination?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Sampling and analytical methods for determining whether soil contamination or decontamination residues are H.W.?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Testing criteria for determining adequacy of clean-up?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
Methods of treatment or disposal of contaminated soils and residues?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

VIII. Closure and Post-Closure: - Continued  
(Part 265 Subpart G)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
e. Estimate of the expected year of closure (265.112a.4)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>In closure plan</u>
f. Schedule for final closure activities (265.112a.4)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
g. Does the schedule include:			
Total time required to close?	<input type="checkbox"/>	<input type="checkbox"/>	<u>326 days for storage tanks &amp; containers in Part A</u>
Time required for intervening closure activities? (e.g., Time required for H.W. treatment, disposal, decontamination, and certification inspections.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>90 days after closure for certification and reporting</u>
4. Has the facility amended the plan whenever changes in operating practice or process design affect the plan or there is a change in the expected year of closure (265.112b)? (Plan must be amended within 60 days of the changes.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Has the facility submitted a closure plan to the RA at least 180 days before the date they expect to begin closure (265.112c)?	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A</u>
(B) Time Allowed For Closure:			
1. Does the schedule for final closure allow for the following:			
a. Treatment, removal, or disposal of H.W. within 90 days after receipt of final volume of H.W. or after approval of closure plan (265.113a)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b. Completion of closure plan activities within 180 days after receipt of final volume of H.W. or after approval of closure plan (265.113b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

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VIII. Closure and Post-Closure: - Continued  
(Part 265 Subpart G)

Yes   No   Comments

(C) Disposal And Decontamination Of Equipment:

1. For facilities that have completed closure activities, has all equipment and structures been properly disposed of or decontaminated by removing all H.W. and contaminated residues (265.114)?

\_\_\_\_\_ N/A \_\_\_\_\_

(D) Certification Of Closure:

1. For facilities that have completed closure activities, has a certification by owner/operator and an independent registered professional engineer been submitted to the RA (265.115)?

\_\_\_\_\_ N/A \_\_\_\_\_

(E) Partial Closure:

1. Does the facility plan to close discreet regulated H.W. management units during the intended operating life?

✓ \_\_\_\_\_ Three H.W. surface impoundment are closed already.

If "Yes" complete compliance form for partial closure.

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VIII. Closure and Post-Closure: - Continued  
(Part 265 Subpart G)

## Compliance Form For Partial Closure

	Yes	No	Comments
(E) Partial Closure:			Actual document not at Facility.
1. Does the closure plan describe how the facility will be partially closed (265.112a.1)?	—	—	(three H.W. areas) Impoundments closed in 1983
2. Does the plan describe the size of areas partially closed?	—	✓	
3. Does the plan describe the procedures for partial closure?	—	✓	
4. Does the plan address maintenance activities, including: (265.112a.1)			
a. Visual inspections?	—	✓	
b. Ground-water monitoring?	—	✓	
c. Maintaining cover?	—	✓	
d. Maintaining diversion structures?	—	✓	
e. Controlling erosion?	—	✓	
f. Maintaining vegetation?	—	✓	
g. Maintaining site security systems?	—	✓	
h. Leachate collection system?	—	✓	
i. Gas collection system?	—	—	N/A
j. Other (specify)?	—	—	N/A
5. Does the plan describe the frequencies for each type of maintenance activity (265.112a.1)?	—	✓	
6. Does the plan describe when the facility will be partially closed (265.112a.1)?	—	✓	
7. Does the schedule for partial closure include: (265.112a.1)			
a. Date(s) of partial closure(s)?	—	✓	
b. Total time required for each partial closure?	—	✓	
c. Time required for intervening partial closure activities? (e.g., time required for waste removal, stabilization, treatment, disposal; placement of cover; vegetation; decontamination; certification.)	—	✓	

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IX. Financial Requirements: - Continued  
(Part 265 Subpart H)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
6. Was the cost estimate revised whenever a change in the closure plan <i>decrease</i> increased the cost of closure (265.142c)? (Revised estimate must be adjusted for inflation.)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>decreases cost of closure</u> Facility did not include closure for operation building. (non hazardous)
7. Are the following kept at the facility during the operating life of the facility: (265.142d)			
a. Latest closure cost estimate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b. Latest adjusted closure cost estimate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8. Is there written documentation supporting the closure cost estimate?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
a. Workups from labor, material and equipment requirements?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b. Contractor estimates and bids?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
c. Figures derived from cost estimating handbooks?	<input type="checkbox"/>	<input type="checkbox"/>	<u>Very little.</u> <u>Mostly from knowledge and current rates</u>
d. Figures derived from operator experience?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9. Does the estimate accurately reflect the cost of closure for similar types of facilities?	<input type="checkbox"/>	<input type="checkbox"/>	<u>not inspection</u>

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X. Use And Management Of Containers:  
(Part 265 Subpart I)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
1. Does the facility transfer H.W. from containers not in good condition or leaking to containers in good condition (265.171)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>NO Leaking drums observed</u>
2. Are containers compatible with H.W. stored in them (265.172)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
3. Are containers stored closed (265.173a)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<u>one drum top open in temp Storage area, &amp; Notified facility.</u>
4. Are containers managed to prevent rupture or leakage (265.173b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
5. Are containers inspected weekly for leaks and deterioration (265.174)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
6. Are ignitable or reactive wastes stored at least 50 feet from the facility's property line (265.176)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
7. Are incompatible wastes stored in separate containers (265.177a)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
8. Are H.W. not placed in unwashed containers that previously held an incompatible waste or material (265.177b)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
9. Are containers holding a H.W. that is incompatible with any waste or materials stored nearby in other containers, piles, open tanks, or surface impoundments separated from the incompatibles by sufficient distance or protected by means of a dike, berm, wall, or other device (265.177c)?	<input type="checkbox"/>	<input type="checkbox"/>	<u>N/A waste areas not adjacent to each other.</u>
10. Are containers that are not empty managed as a H.W. (261.7a.2)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
11. For a container to be considered empty the facility must ensure that:			
a. No more than one inch of residue remains on bottom of container or inner lining (261.7b.1)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
b. Containers that held an acutely H.W. are tripled rinsed using a solvent capable of removing the contents (261.7b.3)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	



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XI. Tanks:  
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
1. Is the treatment or storage of H.W. in tanks conducted so that it does not: (265.192a)			
a. Generate extreme heat or pressure; fire or explosion; or violent reaction?	✓		
b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases?	✓		
c. Damage the structural integrity of the tank?			Liner in tank farm not good. Tank farm is not being used at this time. Liner needs to be replaced.
2. Are H.W. or treatment reagents placed in a tank so that they do not cause the tank or its inner liner to rupture, leak, corrode, or otherwise fail (265.192b)?			
3. Do uncovered tanks have at least 2 feet of freeboard, or dikes, or other containment features (265.192c)?			N/A
4. Where H.W. is continuously fed into a tank, is the tank equipped with a waste feed cutoff system or by-pass system to a stand-by tank (265.192d)?			N/A
5. Does the facility conduct waste analysis and trial treatment or storage tests, or have they obtained written documentation on similar storage or treatment of similar waste under similar operating conditions before the tank is used to:			
a. Chemically treat or store a H.W. which is substantially different from waste previously treated or stored in the tank (265.193a.1)?			N/A
b. Chemically treat H.W. with a substantially different process than was previously used (265.193a.2)?	✓		

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XI. Tanks: - Continued  
(Part 265 Subpart J)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
6. Are daily and weekly inspections done for the following:			
a. Discharge control equipment e.g., feed cutoff, bypass and drainage systems (Daily) (265.194a.1)?	✓	—	_____
b. Data gathered from monitoring equipment e.g., pressure and temperature gauges (Daily) (265.194a.2)?	✓	—	_____
c. Level of waste in uncovered tanks (Daily) (265.194a.3)?	✓	—	N/A
d. Construction materials of tank e.g., corrosion, leaking fixtures or seams (Weekly) (265.194a.4)?	✓	—	_____
e. Discharge confinement structures e.g., dikes (Weekly) (265.194a.5)?	✓	—	_____
7. At closure, are all H.W. and residues removed from tanks and associated equipment and structures (265.197)?	—	—	N/A
8. Are ignitable or reactive waste treated, rendered, or mixed before or immediately after placement in a tank so that the resulting waste no longer meets the definition of ignitability or reactivity (265.198a.1)? or	—	—	N/A
9. Are ignitable or reactive waste stored or treated in such a way that it is protected from conditions which may cause the waste to ignite or react (265.198a.2)?	✓	—	_____
10. Does the facility comply with the buffer zone requirements for covered tanks containing ignitable or reactive wastes specified in tables 2-1 through 2-6 of the National Fire Protection Association's "Flammable and Combustible Liquids Code" (1977 or 1981) (265.198b)?	✓	—	_____
11. Are incompatible wastes stored in separate tanks (265.199a)?	—	—	N/A
12. Are H.W. not placed in unwashed tanks that previously held an incompatible waste or material (265.199b)?	—	—	N/A

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XII. Surface Impoundments:  
(Part 265 Subpart K)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
1. Do impoundments have at least 2 feet of freeboard (265.222)?	—	—	<i>N/A No active surface impoundments</i>
2. Do earthen dikes have protective cover to minimize wind and water erosion and to preserve their structural integrity (265.223)?	—	—	
3. Does the facility conduct waste analysis and trial treatment tests, or have they obtained written documentation on similar treatment of similar waste under similar operating conditions before the impoundment is is used to:			
a. Chemically treat a H.W. which is substantially different from waste previously treated in the impoundment (265.225a.1)?	—	—	
b. Chemically treat H.W. with a substantially different process than was previously used (265.225a.2)?	—	—	
4. Is the treatment of H.W. in impoundments conducted so that it does not: (265.225a.2)			
a. Generate extreme heat or pressure; fire or explosion; or violent reaction?	—	—	
b. Produce uncontrolled toxic or flammable mists, fumes, dusts, or gases?	—	—	
c. Damage the structural integrity of the liner?	—	—	
d. Threaten human health or the environment?	—	—	
5. Is the freeboard level inspected at least daily (265.226a.1)?	—	—	
6. Are the dikes inspected weekly for evidence of leaks, deterioration or failure (265.226a.2)?	—	—	

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XII. Surface Impoundments: - Continued  
(Part 265 Subpart K)

(Rubbered line ponds)

	<u>Yes</u>	<u>No</u>	<u>Comments</u>
7. At closure, has the facility removed from the impoundments: (265.228a)			(Tank Farm) # 317 rubber line pond. Now concrete containment for tank storage. # 342 Red Phosphorus (Lower Pond) - waiting for DOHS lead Azide wash water source approval.
a. Standing liquids?	✓	—	
b. Waste and waste residues?	✓	—	
c. The liner, if any?	✓	—	
d. Underlying and surrounding contaminated soil?	✓	—	No closure cert. action could be produced concerning analysis.
8. At closure, has the facility demonstrated under § 261.3 c & d that none of the materials listed in (7) remaining at any stage of removal are H.W. (265.228b)?	—	✓	
9. If the answers to (7) & (8) are no, has the facility closed the impoundment and provided post-closure care as a landfill (265.228c)?	—	✓	
10. Is an ignitable or reactive waste treated, or mixed before or immediately after placement in an impoundment so that the resulting waste no longer meets the definition of ignitability or reactivity (265.229a.1)?	—	—	N/A
11. Does the facility take precautions to ensure that incompatible wastes and materials are not placed in the same impoundment (265.230)?	—	—	N/A

Section ~~XIII~~ Waste Piles  
" ~~XIV~~ Land Treatment  
" ~~XV~~ Landfills  
are deleted - N/A

Inspection Checklist for HSWA Requirements

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Loss of Interim Status (\$270.73)

	<u>YES</u>	<u>NO</u>	<u>COMMENTS</u>
1. Does the facility have any RCRA units that were subject to the loss of Interim Status provision of HSWA? (MAJOR FACILITIES)	_____	_____/____	_____
2. Did any of the affected RCRA units lose Interim Status on 11/8/85?	_____	_____/____	_____
3. If so, are any of those units still accepting RCRA hazardous waste?	_____	_____	N/A
4. Which ones?	_____	_____	N/A
5. If the facility has ceased accepting hazardous waste, what was the last date on which RCRA hazardous waste was placed in such unit(s)?	_____	_____	N/A
6. Are any of the RCRA units now accepting waste that is non-hazardous or regulated only by the State?	_____	_____	N/A